

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

March 10, 2016

VIA EMAIL & REGULAR MAIL

Berkeley Lake Village Owners Association, LLC
c/o Mr. Robbie Stephens
P.O. Box 283
7741 Adairsville Highway
Adairsville, Georgia 30103

Re: HSI Site Number: 10844
North Berkeley Lake Road Site
Tax Parcel ID #R6290-232
Berkeley Lake Village Owners Association
Duluth, Gwinnett County, Georgia

Dear Mr. Stephens:

The Georgia Environmental Protection Division (EPD) has received the December 22, 2015 *Response to Comments* and *Voluntary Remediation Program (VRP) Progress Report*, that was submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, on behalf of the Berkeley Lake Village Owners Association (BLVOA) by Geosyntec Consultants. After completing its review of the December 2015 submittal, and in accordance with the discussions held during the February 29, 2016 meeting, EPD has prepared the following comments:

- 1) BLVOA will submit an updated VRP Application Form as part of the next VRP Progress Report that will include the additional parcels and property owner information for the qualifying properties that will be included as part of the site. These parcels should include, but not be limited to, the individual building parcels within the BLVOA parcel #R6290-232 and parcel #R6290-231.
- 2) The December 2015 Report indicated that two groundwater monitoring wells were recently installed at the site property. The data from these wells was not yet available for inclusion into the noted Progress Report, but was presented to EPD during the February 2016 meeting. Geosyntec indicated that one of the two groundwater wells included a detection of arsenic in groundwater above risk reduction standards, but that the sample was outside the acceptable range for turbidity. EPD recommends that additional groundwater samples be collected, with special care taken during sample collection to reduce turbidity, prior to determining that the groundwater has been impacted by the leaching of arsenic from the impacted soils. If acceptable turbidity values cannot be achieved, a replacement well should be considered.
- 3) According to Section 3 of the VRP Progress Report, BLVOA will be evaluating future soil corrective actions at the site, including removal/capping, area averaging, and the use of an environmental covenant. EPD has no objections to these cleanup strategies at this time, but has provided the following recommendations associated with these particular corrective measures:

- a. While area averaging is a viable approach for soil cleanup at VRP sites, additional information necessary to support and justify the use of this approach at this site will be required, including the following:
 - i. Clear definition of the "exposure domain(s)" (ED) and adequate justification of random exposure throughout the established exposure domain(s) should be provided. Please note that depending upon the size/location of the ED's, additional sampling may be needed.
 - ii. A Figure specifically illustrating the established exposure domains and the sample locations within each ED that will be used for the upper confidence limit (UCL) calculations. Please note that the sample locations should be compared to both the spatial structure (vertical and horizontal) of the impacts and the site related EDs.
 - iii. Please indicate the statistical methodology (i.e., iterative truncation, confidence response goal (CRG), geostatistics) that will be utilized.
 - iv. Please include a description of the procedures/excavation plan that will be implemented for the ED(s) with exposure point concentrations above the established cleanup levels.
- b. Please ensure that the environmental covenant is developed in accordance with the Uniform Environmental Covenant Act (O.C.G.A. § 44-16-1 et. seq.). As discussed during the February 2016 meeting, separate UECs can be developed for the BLVOA parcels 6290-232 and 6267-030 based on the different current and future property uses.

Risk Reduction Standards (RRS) Comments

- Approval of the responses to Comments (9)-(12) is pending the receipt of additional documentation in the next report submittal.

Please ensure that the above listed comments are addressed and BLVOA demonstrates compliance with the provisions, purposes, standards, and policies of both the Act and the conditions of the Administrative Order EPD-HSR-574. Responses to the above listed comments may be included in the next VRP Progress Report submittal, which according to the approved VRP schedule is due to EPD by no later than June 25, 2016. Should you have any questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-8660.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

cc: Peter J. de Haven, Geosyntec (email only)
Scott Hitch, Nelson Mullins (email only)
File: VRP – North Berkeley Lake Road Site #10844, BLVOA